

***VitalSource Bookshelf iOS Application (v 3.9.3)***

***VPAT***

Presented to: VitalSource Technologies, Inc.

Contacts:

Rick Johnson  
 VP of Product Development & Sales Engineering

[rick.johnson@ingramdigital.com](mailto:rick.johnson@ingramdigital.com)

Nick Brown

Product Manager

[nick.brown@ingramcontent.com](mailto:nick.brown@ingramcontent.com)

Dave Campbell

Product Manager

[dave.campbell@ingramcontent.com](mailto:dave.campbell@ingramcontent.com)

Blake Perdue

Senior Product Manager

Blake.perdue@ingramcontent.com

Prepared By:

Tech For All, Inc.

[*www.TFAConsulting.com*](http://www.TFAConsulting.com)

February 27, 2017

Rev 1.0

# VPAT for Bookshelf iOS Application

TFA’s evaluation of the Bookshelf iOS (v.3.9.3) application identified accessibility features and functionalities associated with the application. This evaluation provided the information required to assess its conformance with the Section 508 Accessibility Standards, and TFA concludes that overall, the Bookshelf iOS application mostly conforms with the standards. The exceptions are identified in the VPAT documents. *Note that the scope of the VPAT document is the application itself, and does not include the content (books).*

The Information Technology Industry Council (ITIC) has published recommended language to be used in completing VPAT documents that has been designed to create simplicity and uniformity/consistency in VPATs presented by a variety of suppliers. In preparing the Bookshelf iOS application VPAT, TFA has used the ITIC-recommended *VPAT Summary Description and Suggested Language for Completing VPAT* (see *Appendix A)*.

Based on this evaluation and on information published on the ITIC website ([*http://www.itic.org*](http://www.itic.org)), TFA presents the following VPAT document (Table 1 to 3) for the Bookshelf iOS Application:

## Table 1: Section 1194.21 Software Applications and Operating Systems – Detail

|  |  |  |
| --- | --- | --- |
| **Criteria** | **Level of Support &**  **Supporting Features** | **Remarks and Explanations** |
| (a) When software is designed to run on a system that has a keyboard, product functions shall be executable from a keyboard where the function itself or the result of performing a function can be discerned textually. | **Supports with Exceptions** | Using built-in operating system functionality (VoiceOver), most functions are accessible by using a Bluetooth keyboard. Examples of exceptions include selecting text for highlighting or copying. |
| (b) Applications shall not disrupt or disable activated features of other products that are identified as accessibility features, where those features are developed and documented according to industry standards. Applications also shall not disrupt or disable activated features of any operating system that are identified as accessibility features where the application programming interface for those accessibility features has been documented by the manufacturer of the operating system and is available to the product developer. | **Supports** | Bookshelf does not interfere with iOS accessibility features. |
| (c) A well-defined on-screen indication of the current focus shall be provided that moves among interactive interface elements as the input focus changes. The focus shall be programmatically exposed so that Assistive Technology can track focus and focus changes. | **Supports** | Bookshelf uses the standard operating system controls and focus tracking and thru them provides an indication of the current focus for all controls and content, and exposes focus to assistive technology. |
| (d) Sufficient information about a user interface element including the identity, operation and state of the element shall be available to Assistive Technology. When an image represents a program element, the information conveyed by the image must also be available in text. | **Supports with Exceptions** | The vast majority of user interface elements are correctly identified and labeled. A few fields are only labeled with placeholder text; a very small number of controls are not marked up as interactive. |
| (e) When bitmap images are used to identify controls, status indicators, or other programmatic elements, the meaning assigned to those images shall be consistent throughout an application's performance. | **Supports** | Bookshelf uses images and icons in a consistent manner throughout the interface. |
| (f) Textual information shall be provided through operating system functions for displaying text. The minimum information that shall be made available is text content, text input caret location, and text attributes. | **Supports** | Bookshelf exposes information to assistive technology. |
| (g) Applications shall not override user selected contrast and color selections and other individual display attributes. | **Supports** | Bookshelf does not interfere with or override user-selected contrast or color display settings. |
| (h) When animation is displayed, the information shall be displayable in at least one non-animated presentation mode at the option of the user. | **Supports** | Bookshelf will support the display of non-animated images as an alternate or poster frame. For XML based content the use of this is at the discretion of the content creator. PDF based content does not use animations. |
| (i) Color coding shall not be used as the only means of conveying information, indicating an action, prompting a response, or distinguishing a visual element. | **Supports** | Bookshelf does not use color as the sole means of conveying information and can be used in reverse color mode without loss of comprehension. |
| (j) When a product permits a user to adjust color and contrast settings, a variety of color selections capable of producing a range of contrast levels shall be provided. | **Not Applicable** | Bookshelf does not have color/contrast adjustments. |
| (k) Software shall not use flashing or blinking text, objects, or other elements having a flash or blink frequency greater than 2 Hz and lower than 55 Hz. | **Supports** | Bookshelf does not use flashing or blinking text, objects, or elements. |
| (l) When electronic forms are used, the form shall allow people using Assistive Technology to access the information, field elements, and functionality required for completion and submission of the form, including all directions and cues. | **Supports with Exceptions** | Some controls are only labeled with placeholder text. |

## 

## Table 2: Section 1194.31 Functional Performance Criteria – Detail

|  |  |  |
| --- | --- | --- |
| **Criteria** | **Level of Support &**  **Supporting Features** | **Remarks and explanations** |
| (a) At least one mode of operation and information retrieval that does not require user vision shall be provided, or support for Assistive Technology used by people who are blind or visually impaired shall be provided. | **Supports with Exceptions** | Bookshelf provides access to most functions and is compatible with the VoiceOver screen reader.  Examples of exceptions include selecting text for highlighting or copying, which does not consistently work with VoiceOver. Using the built-in read aloud function crashes the app if used with VoiceOver. |
| (b) At least one mode of operation and information retrieval that does not require visual acuity greater than 20/70 shall be provided in audio and enlarged print output working together or independently, or support for Assistive Technology used by people who are visually impaired shall be provided. | **Supports with Exceptions** | Bookshelf supports operating system Zoom and Invert Colors features. All interface elements have sufficient color contrast. Speak Selection cannot be used in the Book Reader. Bookshelf does not support iOS font size options. |
| (c) At least one mode of operation and information retrieval that does not require user hearing shall be provided, or support for Assistive Technology used by people who are deaf or hard of hearing shall be provided | **Supports** | Bookshelf iOS has a read aloud function, and visually reading the text serves as a second mode for deaf or hard of hearing users. |
| (d) Where audio information is important for the use of a product, at least one mode of operation and information retrieval shall be provided in an enhanced auditory fashion, or support for assistive hearing devices shall be provided. | **Supports** | Enhanced auditory support is provided by the mobile device in the form of a volume control and earphone output, as well as Bluetooth interface with hearing aid devices. |
| (e) At least one mode of operation and information retrieval that does not require user speech shall be provided, or support for Assistive Technology used by people with disabilities shall be provided. | **Supports** | Bookshelf does not have modes of operation that require speech. |
| (f) At least one mode of operation and information retrieval that does not require fine motor control or simultaneous actions and that is operable with limited reach and strength shall be provided. | **Supports with Exceptions** | Bookshelf can be navigated using an external keyboard with VoiceOver, as well as AssistiveTouch iOS feature. The only limitation is inability to select text for highlighting or copying. |

## 

## Table 3: Section 1194.41 Information, Documentation, and Support

|  |  |  |
| --- | --- | --- |
| **Criteria** | **Level of Support & Supporting Features** | **Remarks and explanations** |
| (a) Product support documentation provided to end-users shall be made available in alternate formats upon request, at no additional charge | **Supports** | Bookshelf provides free online help in HTML format. |
| (b) End-users shall have access to a description of the accessibility and compatibility features of products in alternate formats or alternate methods upon request, at no additional charge. | **Supports** | Bookshelf online help provides documentation for access technology users. |
| (c) Support services for products shall accommodate the communication needs of end-users with disabilities. | **Supports** | Support for Bookshelf products is available via the online support pages, and phone. |

# Concluding Remarks

The evaluation conducted for this project demonstrates that the Bookshelf iOS (v.3.9.3) application mostly conforms with the Section 508 Accessibility Standards. In order for the Bookshelf iOS application to fully conform with the Section 508 Accessibility Standards, additional accessibility remediation efforts will be required. That said, TFA is confident that by remediating the reported accessibility and usability issues, and implementing its recommendations, VitalSource can achieve conformance with Section 508, and most importantly be fully usable by its customers with disabilities.

# Appendix A: Background On VPAT

To facilitate effective communication between producers of products and services and those who acquire them concerning the accessibility of specific products, an accessibility information template was created by a joint government and industry effort. The VPAT document was created by the Information Technology Industry Council ([*www.itic.org*](http://www.itic.org)) based on Section 508 Standards established by the United States Access Board ([*www.access-board.gov*](http://www.access-board.gov)) in 2001.

The use of the VPAT as an evaluation tool has enabled companies and organizations to self-document and formally attest to conformance and nonconformance with specific Section 508 accessibility requirements point by point. Its purpose is to assist federal and state contracting officials and other purchasers in making preliminary assessments regarding the availability of commercial Information and Communication Technologies (ICT) products and services with features that support accessibility. Vendors are frequently required to submit VPATs with their responses to RFPs and other government purchasing proposals.

For each ICT product category to which Section 508 applies, three different requirements need to be addressed. (Complete information regarding these requirements can be found at the [*www.section508.gov*](http://www.section508.gov) and [*www.itic.org*](http://www.itic.org) websites):

1. Specific Requirements, corresponding to specific product groups:
   * Section 1194.21 Software Applications and Operating Systems
   * Section 1194.22 Web-based Internet Information and Applications
   * Section 1194.23 Telecommunications Products
   * Section 1194.24 Video and Multimedia Products
   * Section 1194.25 Self-Contained, Closed Products
   * Section 1194.26 Desktop and Portable Computers
2. Section 1194.31 Functional Performance Criteria, “Functional Performance Criteria,” applying to all product groups
3. Section 1194.41 Information, Documentation, and Support: General Requirement, “Information, Documentation, and Support,” applying to the information provided *accompanying* all ICT products. Thus FAQ’s, Manuals and the like must all be accessible.

Considering that the VPAT carries important information for the procurement official, it is essential that a supplier/producer provide an accurately prepared VPAT that fairly and responsibly represents its product and/or service.

**Suggested Language for Completing VPAT**

In order to simplify the task of conducting market research assessments for procurement officials or customers, ITIC ([*www.itic.org*](http://www.itic.org)) has developed suggested language for use when filling out a VPAT document. The following table provides the suggested language.

***Column 1 – Level of Support & Supporting Features***

***Column 2 - Remarks and Explanations***

Feedback from procurement officials and customers shows that providing further explanation regarding features and exceptions is especially helpful. Use this column to detail how the product addresses the standard or criteria by:

* Listing accessibility features or features that are accessible
* Detailing where in the product an exception occurs

Explaining equivalent methods of facilitation (definition of "equivalent facilitation" -see 36 CFR 1194.5.)

|  |  |
| --- | --- |
| **Level of Support &**  **Supporting Features** | **Recommended Language** |
| Supports | Use this language when you determine the product fully meets the letter and intent of the Criteria. |
| Supports with Exceptions | Use this language when you determine the product does not fully meet the letter and intent of the Criteria, but provides some level of access relative to the Criteria. |
| Supports through Equivalent Facilitation | Use this language when you have identified an alternate way to meet the intent of the Criteria or when the product does not fully meet the intent of the Criteria. |
| Supports when combined with Compatible Assistive Technology | Use this language when you determine the product fully meets the letter and intent of the Criteria when used in combination with Compatible Assistive Technology. For example, many software programs can provide speech output when combined with a compatible screen reader (commonly used assistive technology for people who are blind). |
| Does not Support | Use this language when you determine the product does not meet the letter or intent of the Criteria. |
| Not Applicable | Use this language when you determine that the Criteria do not apply to the specific product. |
| Not Applicable - Fundamental Alteration Exception Applies | Use this language when you determine a Fundamental Alteration of the product would be required to meet the Criteria (see the access board standards for the definition of "fundamental alteration"). |